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10 Attorneys for Plaintiff International Freight Services, Inc.

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA

13 INTERNATIONAL FREIGHT SERVICES,  
14 INC., a California corporation,

15 Plaintiff,

16 v.

17 GREEN WORLDWIDE SHIPPING, LLC, a  
18 Georgia limited liability company; MARY  
19 THOMPSON, an individual; FELICIA  
20 ADDISON, an individual; NATIVIDAD JUNI,  
21 an individual; and DANIEL C. MCCARTHY,  
22 an individual,

23 Defendants.

Case No. 21-cv-07069 YGR

ORDER GRANTING STIPULATED  
PRELIMINARY INJUNCTION  
~~[PROPOSED]~~

DATE: November 3, 2021

TIME: 1:00 p.m.

JUDGE: Hon. Yvonne Gonzalez Rogers

COURTROOM: 1, Fourth Floor

LOCATION: 1301 Clay Street, Oakland, CA

24 WHEREAS, a Temporary Restraining Order and Order to Show Cause Re: Preliminary  
25 Injunction (“TRO and OSC”) was entered in this matter on October 20, 2021; and

26 WHEREAS, after entry of the TRO and OSC the parties have reached agreement on measures  
27 which extend and supplement its terms;

28 NOW, THEREFORE, plaintiff International Freight Services, Inc. and defendants Green  
29 Worldwide Shipping, LLC, Mary Thompson, Felicia Addison, Natividad Juni and Daniel C. McCarthy,  
30  
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1 by and through their respective counsel, hereby stipulate that during the pendency of this action,  
2 defendants Green Worldwide Shipping, LLC, Mary Thompson, Felicia Addison, Natividad Juni and  
3 Daniel C. McCarthy, along with those acting in concert with them, shall be enjoined and restrained  
4 from engaging in any of the following acts:  
5

- 6 1. Soliciting, contacting or attempting to contact persons or entities which were customers of  
7 plaintiff at any time between 2012 and August 1, 2021, other than those set forth on Exhibit  
8 A hereto;
- 10 2. Making any use or disclosure of any information obtained from plaintiff (apart from  
11 information pertaining to the entities set forth on Exhibit A hereto), including but not limited  
12 to the identities of plaintiff's customers or the latter's key personnel, contact information and  
13 particular needs;
- 15 3. Continuing to do business with any persons or entities which were customers of plaintiff at  
16 any time between 2012 and August 1, 2021, other than those set forth on Exhibit A hereto;
- 18 4. Communicating to any persons or entities that you are authorized to conduct business on  
19 behalf of any persons or entities which were customers of plaintiff at any time between 2012  
20 and August 1, 2021, other than those set forth on Exhibit A hereto; and
- 22 5. Otherwise using or disclosing plaintiff's customer data.

24 IT IS FURTHER STIPULATED that, no later than Friday, October 29, 2021, defendants shall  
25 provide to plaintiff's counsel a list of all couriers (e.g., FedEx, UPS) and overseas agents with whom  
26 they have altered any customs broker designations (import or export) on behalf of plaintiff's customers,  
27 apart from those set forth on Exhibit A hereto, along with the identities of the customers affected as  
28 well as the details of any shipments involving such customers which may have been impacted by  
29 defendants' actions.  
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1 IT IS FURTHER STIPULATED that, no later than Wednesday, November 3, 2021, defendants  
2 and those acting in concert with them shall account for and return to plaintiff any and all of plaintiff's  
3 property in their possession or control, including its confidential, proprietary and trade secret  
4 information, whether or not contained in defendants' notebooks, documents, digital files, cloud storage,  
5 email, media and/or other materials.  
6

7 IT IS FURTHER STIPULATED that, in the event defendants are henceforward contacted by  
8 any of plaintiff's customers (aside from those set forth in Exhibit A hereto), they shall promptly refer  
9 such customers back to plaintiff for handling their shipping needs.  
10

11 IT IS FURTHER STIPULATED that this stipulated preliminary injunction shall issue without  
12 the necessity of a bond.  
13

14 IT IS FURTHER STIPULATED that the November 3, 2021 hearing date set in the TRO and  
15 OSC shall be vacated, along with the associated briefing schedule.  
16

17 Dated: October 26, 2021

CHAUVEL & GLATT, LLP

/s/

18 By: \_\_\_\_\_  
19

Kenneth M. Weinfield

Attorneys for Plaintiff International Freight Services, Inc.  
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22 Dated: October 26, 2021

BURNHAM BROWN

/s/

23 By: \_\_\_\_\_  
24

Raymond Greene III

Attorneys for Defendants Green Worldwide Shipping, LLC,  
Mary Thompson, Felicia Addison, Natividad Juni and  
Daniel C. McCarthy  
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Pursuant to the parties' stipulation, and good cause appearing, IT IS HEREBY ORDERED that during the pendency of this action, defendants Green Worldwide Shipping, LLC, Mary Thompson, Felicia Addison, Natividad Juni and Daniel C. McCarthy, along with those acting in concert with them, are hereby enjoined and restrained from engaging in any of the following acts:

1. Soliciting, contacting or attempting to contact persons or entities which were customers of plaintiff at any time between 2012 and August 1, 2021, other than those set forth on Exhibit A hereto;
2. Making any use or disclosure of any information obtained from plaintiff (apart from information pertaining to the entities set forth on Exhibit A hereto), including but not limited to the identities of plaintiff's customers or the latter's key personnel, contact information and particular needs;
3. Continuing to do business with any persons or entities which were customers of plaintiff at any time between 2012 and August 1, 2021, other than those set forth on Exhibit A hereto;
4. Communicating to any persons or entities that you are authorized to conduct business on behalf of any persons or entities which were customers of plaintiff at any time between 2012 and August 1, 2021, other than those set forth on Exhibit A hereto; and
5. Otherwise using or disclosing plaintiff's customer data.

IT IS FURTHER ORDERED that, no later than Friday, October 29, 2021, defendants shall provide to plaintiff's counsel a list of all couriers (e.g., FedEx, UPS) and overseas agents with whom they have altered any customs broker designations (import or export) on behalf of plaintiff's customers, apart from those set forth in Exhibit A hereto, along with the identities of the customers affected as well as the details of any shipments involving such customers which may have been impacted by defendants' actions.


1 IT IS FURTHER ORDERED that, no later than Wednesday, November 3, 2021, defendants and  
2 those acting in concert with them account for and return to plaintiff any and all of plaintiff's property in  
3 their possession or control, including its confidential, proprietary and trade secret information, whether  
4 or not contained in defendants' notebooks, documents, digital files, cloud storage, email, media and/or  
5 other materials.  
6

7 IT IS FURTHER ORDERED that, in the event defendants are henceforward contacted by any of  
8 plaintiff's customers (aside from those set forth in Exhibit A hereto), they shall promptly refer such  
9 customers back to plaintiff for handling their shipping needs.  
10

11 IT IS FURTHER ORDERED that this stipulated preliminary injunction shall issue without the  
12 necessity of a bond.  
13

14 IT IS FURTHER ORDERED that the November 3, 2021 hearing date set in the TRO and OSC  
15 shall be vacated, along with the associated briefing schedule.  
16

17 DATED: October 27, 2021  
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20   
21 Yvonne Gonzalez Rogers  
22 UNITED STATES DISTRICT JUDGE  
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**EXHIBIT A**

- 1: Cadence
- 2: Cinde K Dolphin dba Kili Carrier
- 3: CRU Dataport
- 4: Gilbane Federal
- 5: Glass Coating Technology
- 6: Legacy Transportation
- 7: Mgwino Holdings LLC DBA Amedeo
- 8: Packing Arts, Inc dba Affinity Creative Group
- 9: Ralph's-pugh Co, Inc
- 10: Restoration Hardware
- 11: S3S USA LLC
- 12: Sonim Technologies
- 13: SRS Global Reach
- 14: The Hoover Institution